

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA]
] No. 05-CR-30042-MLW
v.]
] CESAR CRUZ and]
RICARDO DIAZ]

GOVERNMENT'S MOTION FOR LEAVE TO SUPPLEMENT TRIAL BRIEF

The United States hereby respectfully requests leave to supplement its trial brief, filed on April 11, 2006. As grounds for this motion the government states that trial counsel is new to this case, having been assigned the matter on April 11, 2006. As the government has prepared for trial and discussed the case with defense counsel, additional issues have arisen that the government believes the Court may wish to hear, or at least be aware of, before trial commences on May 1. Thus the government seeks to file the attached supplement in anticipation of the final pretrial conference scheduled for April 26, 2006.

WHEREFORE, the government requests leave to file a supplement to its trial brief, which has been filed simultaneously with this motion.

Respectfully submitted,

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United States Attorney

By: /s/: Andrew E. Lelling
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Date: April 24, 2006